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April 14, 2008

VIA ECF

Hon. Ramon E. Reyes, Jr.
United States Magistrate Judge
United States Courthouse
225 Cadman Plaza East, Rm. 263
Brooklyn, New York 11201

Re: Willix et. al. v. HealthFirst, Inc. et. al.,
07-CV-1143 (ENV)(RER)

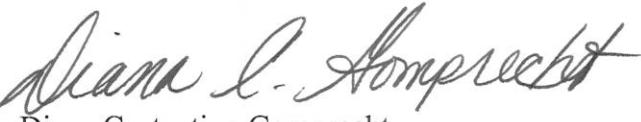
Dear Judge Reyes:

We represent the defendants in the above-referenced litigation. Together with plaintiffs, we write to request an adjournment of the current discovery deadline and the conference scheduled for April 18, 2008, in order to allow the parties to pursue mediation. This is the parties' third request to adjourn the discovery deadline and first request to adjourn the conference.

On April 8, 2008, the parties held a face-to-face settlement conference and agreed to proceed to mediation as soon as possible. The parties would like to suspend discovery during the mediation process in order to conserve the Court's and parties' resources. Because the April 18th conference would also address discovery issues, the parties believe it would be most efficient to adjourn that as well. In the event settlement efforts fail, the parties expect to need three more weeks of discovery for phase one, which would be followed by cross-motions for summary judgment. We therefore respectfully suggest that the parties submit a new schedule, including dates for summary judgment briefing, if and when they cannot settle.

Thank you in advance for your consideration.

Respectfully submitted,


Diana Costantino Gomprecht

cc: Justin M. Swartz, Esq. (by email and ECF)
ReNika Moore, Esq. (by email and ECF)
Rachael Bien, Esq. (by email and ECF)

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